



Tower 6
600 Hamilton Street
Suite 330
Allentown, PA 18101
p: 484.544.0022
f: 484.750.2540

VIA ELECTRONIC CASE FILING

April 25, 2025

The Honorable Judge Julien X. Neals
United States District Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street #4015
Newark, New Jersey 07102

Re: The Roman Catholic Diocese of Paterson, New Jersey, et al. v. United States Department of State, et al., Case 2:24-cv-08350-JXN-MAH

Dear Judge Neals:

We act for Plaintiffs, the Roman Catholic Diocese of Paterson, New Jersey, Father Manuel Alejandro Cuellar Ceballos, Father Regin Nico Dela Cruz Quintos, Father Joemin Kharlo Chong Parinas, Father Armando Diaz Vizcara Jr., and Father Joseph Aguila Mactal (“Plaintiffs”).

On November 11, 2024, Plaintiffs filed a Motion to Stay All Proceedings Through and Including December 31, 2024 (the “Motion-1”). ECF No. 18. Defendants, United States Department of State, United States Department of Homeland Security, United States Citizenship and Immigration Services, Antony Blinken, in his official capacity as Secretary of the United States Department of State, Alejandro Mayorkas, in his official capacity as Secretary of the United States Department of Homeland Security, and Ur Mendoza Jaddou, in her official capacity as Director of United States Citizenship and Immigration Services (“Defendants”), did not oppose the Motion. Id. The Court granted Motion-1 and proceedings were stayed. ECF No. 19

On December 30, 2024, Plaintiffs filed an unopposed motion to extend the stay of proceedings until March 31, 2025 (“Motion 2”). ECF No. 25. The Court granted Motion-2, thus extending the stay of proceedings through March 31, 2025. ECF No. 26.

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On April 11, 2025, the Court ordered Plaintiffs and Defendants to: (1) provide a status report on or before April 25, 2025, as to the status of resolving these proceedings; or (2) if there exists no update, to propose three dates in June and/or July for a telephone status conference. ECF. No. 39.

Following discussion with and consent from Counsel for Defendants, Plaintiffs report the following:

On April 3, 2025, Senators Tim Kaine (D-VA), Susan Collins (R-ME), and James Risch (R-ID) introduced to Senate Bill 1298, the Religious Workforce Protection Act, in the United States Senate (“S. 1298”). See Text - S.1298 - 119th Congress (2025-2026): Religious Workforce Protection Act, S.1298, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/senate-bill/1298/text>. S. 1298 is bipartisan legislation that “authorize[s] the continuation of lawful nonimmigrant status for certain religious workers affected by the backlog for religious worker immigrant visas.” Id.

S. 1298 would amend Section 214(a)(2) of the Immigration and Nationality Act (the “Act”), 8 U.S.C. 1184(a)(2), to allow a religious worker to apply for, and Defendant, Secretary of the United States Department of Homeland Security, to grant, an extension of nonimmigrant religious worker status (R-1) until the religious worker’s application to adjust status or for an immigrant visa is adjudicated, if the religious worker would be otherwise granted permanent residence, but for the numerical limitations that the Act imposes. Id. As of today, S. 1298 is before the Senate Judiciary Committee. See Actions - S.1298 - 119th Congress (2025-2026): Religious Workforce Protection Act, S.1298, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/senate-bill/1298/all-actions>.

Moreover, on April 7, 2025, House Resolution 2672 (“H.B. 2672”), the Religious Workforce Protection Act, was introduced in the United States House of Representatives (the “House”). See Text - H.R.2672 - 119th Congress (2025-2026): Religious Workforce Protection Act, H.R.2672, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-bill/2672/text>. H.R. 2672 is identical to S. 1298. Compare Text - S. 1298, 119th Cong. with Text - H.R. 2672, 119th Cong. Moreover, like S. 1298, H.R. 2672 enjoys bipartisan support. See Cosponsors - H.R.2672 - 119th Congress (2025-2026): Religious Workforce Protection Act, H.R.2672, 119th Cong. (2025), <https://www.congress.gov/bill/119th-congress/house-bill/2672/cosponsors>.

Plaintiffs agree that the enactment of either S. 1298 or H.R. 2672 will remedy Plaintiffs’ claims, thus rendering these proceedings moot. Considering the

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bipartisan legislative actions that we report herein, Plaintiffs request that the Court continue to stay these proceedings. Defendants do not oppose Plaintiffs' request.

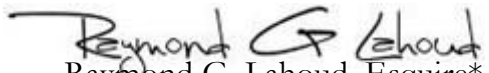
Should the Court seek a telephone status conference, Plaintiffs and Defendants propose the following dates: July 9, 2025, July 16, 2025, or July 23, 2025.

We respectfully await and appreciate the Court's direction.

Very Truly Yours,

LAHOUD LAW GROUP, P.C.


Daniel J. Baurkot, Esquire


Raymond G. Lahoud, Esquire*
**Pro Hac Vice*

DJB:RGL:rc

cc: Counsel for Defendants (via ECF)